

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

TIMOTHY BOZUNG, individually and on behalf of all others similarly situated,

Plaintiff,

v.

CHRISTIANBOOK, LLC f/k/a
CHRISTIAN BOOK DISTRIBUTORS
CATALOG, LLC,

Defendant.

Case No. 1:22-cv-00304-HYJ-RSK

Honorable Hala Y. Jarbou

**SECOND AMENDED CLASS
ACTION COMPLAINT**

JURY TRIAL DEMANDED

**BRIEF IN SUPPORT OF PLAINTIFF'S MOTION TO SEAL CERTAIN
PORTIONS OF THEIR MOTION FOR RELIEF FROM JUDGMENT
PURSUANT TO FED. R. CIV. P. 59(e) & FED. R. CIV. P. 60(b)
AND FOR LEAVE TO FILE SECOND AMENDED COMPLAINT
PURSUANT TO FED. R. CIV. P. 15(a) AND CERTAIN PORTIONS OF
THE EXHIBIT ATTACHED THERETO**

STATEMENT OF ISSUE PRESENTED

Whether Plaintiff may file under seal certain references in Plaintiff's Motion for Relief From Judgment Pursuant to Fed. R. Civ. P. 59(e) & Fed. R. Civ. P. 60(b) and for Leave to File Second Amended Complaint Pursuant to Fed. R. Civ. P. 15(a) and attached exhibit thereto pending a ruling by the Court on the continued sealing of those references to the Confidential Documents?

Plaintiff answers: Yes.

CONTROLLING OR MOST APPROPRIATE AUTHORITIES

- W.D. Mich. LCivR 10.6

For the reasons explained in the above Motion, Plaintiff respectfully seeks to file under seal certain references in Plaintiff's Motion for Relief From Judgment Pursuant to Fed. R. Civ. P. 59(e) & Fed. R. Civ. P. 60(b) and for Leave to File Second Amended Complaint Pursuant to Fed. R. Civ. P. 15(a) and attached exhibit thereto.

Dated: March 14, 2023

Respectfully submitted,

/s/ E. Powell Miller
E. Powell Miller (P39487)
THE MILLER LAW FIRM, P.C.
950 W. University Drive, Suite 300
Rochester, MI 48307
Tel: 248-841-2200
epm@millerlawpc.com

Joseph I. Marchese
Philip L. Fraietta (P85228)
BURSOR & FISHER, P.A.
888 Seventh Avenue
New York, New York 10019
Tel: 646.837.7150
jmarchese@bursor.com
pfraietta@bursor.com

Frank S. Hedin
Arun G. Ravindran
HEDIN HALL LLP
1395 Brickell Avenue, Suite 1140
Miami, Florida 33131
Tel: 305.357.2107
fhedin@hedinhall.com
aravindran@hedinhall.com

Counsel for Plaintiff and the Putative Class

CERTIFICATE OF SERVICE

I hereby certify that on March 14, 2023, I electronically filed the foregoing documents using the Court's electronic filing system, which will notify all counsel of record authorized to receive such filings.

/s/ E. Powell Miller
E. Powell Miller (P39487)
THE MILLER LAW FIRM, P.C.
950 W. University Dr., Ste. 300
Rochester, MI 48307
Tel: (248) 841-2200
epm@millerlawpc.com